

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ROSY GIRON DE REYES, *et al.*,

Plaintiff,

v.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

NOTICE OF FILING OF DEFENDANTS' MOTION TO SEAL

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 5, Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel and in accordance with the Protective Order entered in this matter on August 18, 2016 (Dkt. 45), hereby gives public notice that a Motion to Seal was filed on January 6, 2017 to respectfully move this Court for entry of an Order directing that the confidential documents and information attached to and cited to in Defendants' Reply Memorandum in Support of Defendants' Motion for Summary Judgment and Memorandum in Opposition to Plaintiffs' Cross Motion for Summary Judgment ("Reply") be sealed. Because Plaintiffs and Defendants labeled certain documents and information as confidential under the Protective Order, Defendants' Motion to Seal respectfully moves the Court to seal the following:

- 1) Plaintiffs' confidential deposition transcripts, which are attached as Exhibits 1-5, 13-15 to Defendants' Reply;

- 2) Two confidential Resident Selection & Occupancy Standards documents attached as Exhibits 9-10 and Exhibits 20(1) and (2) to Defendants' Reply;
- 3) A confidential Consumer Reports & CoreLogic SafeRent Training Manual attached as Exhibit 11 and Exhibit 20(3) to Defendants' Reply;
- 4) Confidential letters to unconnected third-party tenants containing private identifying information attached to Defendants' Reply as Exhibit 18.
- 5) A portion of Defendants' Reply which cites to the above-mentioned exhibits.

Defendants' Motion to Seal was filed on November 23, 2016 and memoranda in support of or in opposition to the motion must be filed within seven (7) days after the filing of Defendants' Motion to Seal, and all or part of such memoranda may be designated as confidential. Further, any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the Defendants' Motion to Seal and if no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Respectfully submitted,

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP, WAPLES PROJECT LIMITED
PARTNERSHIP AND
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of January, 2017, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

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